

In re: : Chapter 13
:
TRACY Y TAYLOR :
:
Debtor : Bankruptcy No. 18-17997 AMC

CHAPTER 13 STANDING TRUSTEE’S ANSWER TO MOTION TO MODIFY PLAN

Kenneth E. West, Chapter 13 standing trustee (“standing trustee”), answers the Motion to Modify Plan (“Motion”), with respect to the provisions of 11 U.S.C. § 1329(d), as follows:

1. Debtor filed a plan that was confirmed May 14, 2019. The base amount of the confirmed plan provided to pay the trustee \$189,144.95.
2. Debtor has not completed payments under the confirmed plan and still owes \$3071.02.
3. Debtor now seeks to modify the confirmed plan, reduce the base amount, and seek a refund.
4. The confirmed plan binds the debtor who should be required to complete payments under the confirmed plan and deny the request for a refund.

WHEREFORE, the standing trustee requests that any Order permitting the modification be consistent with the foregoing.

Respectfully submitted,

/s/ Jack K. Miller, Esquire *for*

Date: January 10, 2024,

Kenneth E. West, Esquire
Chapter 13 Standing Trustee